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*Attorneys for Plaintiff National Van Lines, Inc.*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

----- x  
NATIONAL VAN LINES, INC.

Plaintiff,

- v -

NATIONAL VAN EQUIPMENT COMPANY, INC.

Defendant.  
----- x

Civil Action No.

**COMPLAINT**

Plaintiff National Van Lines, Inc. ("**National Van Lines**" or "**Plaintiff**"), by and through its attorneys, Edwards Wildman Palmer LLP, complains and alleges against defendant National Van Equipment Company, Inc. ("**National Van Equipment**" or "**Defendant**") as follows:

### **NATURE OF THE ACTION**

1. National Van Lines seeks injunctive relief and damages for acts of trademark infringement, false designation of origin, trademark dilution, unfair competition, and cybersquatting engaged in by National Van Equipment in violation of the laws of the United States and the State of New York.

### **PARTIES**

2. Plaintiff National Van Lines is an Illinois corporation with its principal place of business located at National Plaza, 2800 Roosevelt Road, Broadview, Illinois, 60153.

3. Defendant National Van Equipment is a New Jersey corporation with a principal place of business located at 38-20 Review Avenue, Long Island City, New York, 11101.

### **JURISDICTION AND VENUE**

4. This Court has jurisdiction over this action pursuant to 15 U.S.C. § 1121 (actions arising under 15 U.S.C., Chapter 22 – Trademarks), 28 U.S.C. § 1331 (federal questions), 28 U.S.C. § 1332 (diversity of citizenship), 28 U.S.C. § 1338(a) (acts of Congress relating to trademarks), and 28 U.S.C. § 1367 (supplemental jurisdiction).

5. This court has personal jurisdiction over Defendant because Defendant's principal place of business is located in this district, and because Plaintiff's claims against Defendant alleged herein arise from Defendant's operation of a business or business venture in this district.

6. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b) and 1391(c) because Defendant resides within this district.

### **FACTS**

#### **National Van Lines' Business & Trademark Ownership**

7. Since long prior to the acts of National Van Equipment complained of herein,

National Van Lines has been engaged in the business, inter alia, of offering moving services to the general public at various locations throughout the United States. National Van Lines ships to all 50 U.S. states as well as internationally.

8. National Van Lines is a woman-owned company that prides itself on its reputation for excellent customer service. National Van Lines' management knows that moving is a personal and emotional event, and therefore National Van Lines takes personal responsibility for its customers' moves, and is committed to ensuring its customers endure the least possible stress and receive their goods on time, on budget, and intact. In November 2006, the General Services Administration rated National Van Lines as the top major van line—averaged over the previous ten years—in household goods customer satisfaction. National Van Lines is also accredited by the Better Business Bureau, maintaining an “A+” rating.

9. Since at least as early as 1928, National Van Lines has provided its moving services to the public under the National Van Lines name and one or more trademarks (collectively, the “**NATIONAL VAN LINES Marks**”). National Van Lines has dedicated significant resources to develop its brand and the service marks associated with its brand and the NATIONAL VAN LINES Marks.

10. National Van Lines, by and through its authorized agents, displays the NATIONAL VAN LINES Marks in advertising and promotional materials for National Van Lines' services—including its website located at URL <http://www.nationalvanlines.com>—and on moving trucks, moving equipment, employee uniforms, boxes, and on other promotional items, used and transported in interstate commerce by National Van Lines and its authorized agents.

11. Since long prior to the acts of National Van Equipment, the NATIONAL VAN LINES Marks have been extremely well-known among consumers throughout the United States.

12. Since long prior to the acts of National Van Equipment, National Van Lines and its licensed agents have generated millions of dollars in annual sales for providing moving services under the NATIONAL VAN LINES Marks. National Van Lines also has spent millions of dollars to advertise and promote moving services under the NATIONAL VAN LINES Marks.

13. Since long prior to the acts of National Van Equipment, and as a result of National Van Lines' extensive use, advertising, and promotion of the NATIONAL VAN LINES Marks, the NATIONAL VAN LINES Marks have become famous and have acquired a strong secondary meaning signifying National Van Lines.

14. National Van Lines has obtained in the United States Patent and Trademark Office several trademark registrations for its marks (copies of the registration certificates of each of the marks detailed below are attached hereto as composite **Exhibit A**). National Van Lines' federal trademark Registrations Numbers 563,950; 712,297; 1,716,566; and 1,718,818 are now incontestable in accordance with 15 U.S.C. §§ 1065 and 1115(b), and therefore serve as conclusive evidence of National Van Lines' exclusive rights to use the marks in commerce. These registrations cover use of the registered marks on a variety of moving services, as follows:

<u>MARK</u>	<u>REG NO.</u>	<u>DATE</u>	<u>GOODS OR SERVICES</u>
NATIONAL	1,718,818	9/22/92	Moving van services
WORLD-WIDE NATIONAL VAN LINES, INC. & Shield Design	1,716,566	9/15/92	Moving van services
WORLD-WIDE NATIONAL VAN LINES, INC. & Shield Design	712,297	3/07/61	Transportation of household goods and uncrated new furniture, storing and arranging for the shipment of goods incidental to said transportation

<u>MARK</u>	<u>REG NO.</u>	<u>DATE</u>	<u>GOODS OR SERVICES</u>
NATIONAL VAN LINES INC. (stylized)	563,950	9/09/52	Transportation of goods by motor van

15. As a result of the extensive use and promotion by National Van Lines of the NATIONAL VAN LINES Marks, National Van Lines now owns valuable goodwill which is symbolized by said marks, and the use of the NATIONAL VAN LINES Marks substantially increases the value of National Van Lines' and its licensed business agents' businesses and the salability of the moving services rendered through them.

16. National Van Lines takes seriously its intellectual property rights in the valuable NATIONAL VAN LINES Marks. National Van Lines sends "cease and desist" letters to users of confusingly similar marks, and has filed multiple lawsuits against such entities in order to protect its rights in the NATIONAL VAN LINES Marks.

**Unauthorized use by National Van Equipment of the NATIONAL VAN LINES Marks**

17. Long after the aforementioned acquisition of fame and secondary meaning of the NATIONAL VAN LINES Marks, National Van Equipment commenced simulating the NATIONAL VAN LINES Marks in interstate commerce in connection with National Van Equipment's own moving equipment business by using the name and mark NATIONAL VAN EQUIPMENT (the "**Infringing Mark**").

18. Upon information and belief, National Van Equipment operates the website available at URL <http://www.nationalvanequip.com> (the "**Infringing Site**"). The domain name <nationalvanequip.com> (the "**Infringing Domain**"), which hosts the Infringing Site, was registered on March 10, 2000 (a true and correct copy of the "Who Is" report from GoDaddy, accessed on May 15, 2014, is attached hereto as **Exhibit B**). The Infringing Mark is depicted

prominently on the Infringing Site, in both logos and the text of the site itself (true and correct images of the home page and the “About Us” page of the Infringing Site as it appeared on May 15, 2014 are attached hereto as composite **Exhibit C**).

19. In or about December 2013, National Van Equipment became a member of the American Moving & Storage Association, substantially raising National Van Equipment’s public profile.

20. Upon information and belief, National Van Equipment’s aforementioned unauthorized uses of the Infringing Mark are willful and deliberate and done with an intent to trade upon the fame and goodwill represented by the NATIONAL VAN LINES Marks, to improperly suggest or imply the existence of an affiliation or license between National Van Equipment and National Van Lines, to dilute the distinctiveness of the NATIONAL VAN LINES Marks, and to mislead and confuse actual and potential consumers.

21. National Van Equipment, without the consent or authority of National Van Lines, has used the Infringing Mark for moving equipment and other goods related to moving and transportation services.

22. Upon information and belief, National Van Equipment’s use of the Infringing Mark has already caused actual confusion in the marketplace.

23. National Van Equipment’s unauthorized use of the Infringing Mark is likely to cause further confusion in the minds of ordinary consumers with respect to the parties’ respective goods and services.

**FIRST CLAIM FOR RELIEF**  
**TRADEMARK INFRINGEMENT (15 U.S.C. § 1114(1)(a))**

24. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-23 of this complaint, as though fully set forth herein.

25. National Van Lines has current federal trademark registrations covering the NATIONAL VAN LINES Marks on a variety of moving and moving-related services. These registrations are valid and enforceable, and together constitute conclusive evidence of National Van Lines' exclusive rights to use the NATIONAL VAN LINES Marks in commerce in the United States, the State of New York, and this Judicial District.

26. Without the consent of National Van Lines, National Van Equipment has used the Infringing Mark in commerce to promote moving equipment and other goods which are closely related to the moving services offered by National Van Lines. National Van Equipment markets and sells its goods in some of the same channels of trade as those used by National Van Lines.

27. National Van Equipment's unauthorized use of the Infringing Mark is likely to cause confusion, mistake, or deception as to the source, sponsorship, or approval of National Van Equipment's moving equipment and related goods. Such use also falsely and deceptively represents National Van Equipment's moving equipment and related goods as being sponsored by, or provided by, National Van Lines.

28. National Van Equipment committed its wrongful actions with the intent to mislead and misdirect consumers.

29. Upon information and belief, by its acts, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

30. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for National Van Equipment's wrongful acts.

31. This is an exceptional case and National Van Lines is entitled, pursuant to 15 U.S.C. § 1117, to recover its reasonable attorneys' fees.

**SECOND CLAIM FOR RELIEF**  
**FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))**

32. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-31 of this complaint, as through fully set forth herein.

33. National Van Equipment's conduct is likely to cause confusion, mistake, or deceit as to the affiliation, connection, or association of National Van Equipment with National Van Lines and as to the origin, sponsorship, or approval by National Van Lines of National Van Equipment and/or its goods.

34. National Van Equipment's unauthorized use of the Infringing Mark constitutes unfair competition and false designation of origin in and affecting interstate commerce.

35. National Van Equipment's unauthorized use of the Infringing Mark falsely suggests that National Van Equipment is associated with National Van Lines.

36. National Van Equipment's unauthorized use of the Infringing Mark is likely to cause consumers to think that National Van Equipment is affiliated with or sponsored by National Van Lines.

37. National Van Equipment's use of the Infringing Mark is knowing and willful.

38. National Van Equipment's conduct has deprived, and will continue to deprive, National Van Lines of opportunities for controlling and expanding its goodwill.

39. Upon information and belief, by its acts, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

40. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for National Van Equipment's wrongful acts.

41. This is an exceptional case and National Van Lines is entitled, pursuant to 15 U.S.C. § 1117, to recover its reasonable attorneys' fees.



**THIRD CLAIM FOR RELIEF**  
**FEDERAL DILUTION (15 U.S.C. § 1125(c))**

42. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-41 of this complaint, as though fully set forth herein.

43. National Van Equipment's unauthorized use of the Infringing Mark has diluted and is likely to dilute the distinctive quality of the famous NATIONAL VAN LINES Marks, and is willfully intended to trade on National Van Lines' reputation and goodwill and to dilute the distinctiveness of the NATIONAL VAN LINES Marks.

44. Upon information and belief, by its acts, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

45. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for National Van Equipment's wrongful acts.

46. This is an exceptional case and National Van Lines is entitled, pursuant to 15 U.S.C. § 1117, to recover its reasonable attorneys' fees.

**FOURTH CLAIM FOR RELIEF**  
**FEDERAL CYBERSQUATTING (15 U.S.C. § 1125(d))**

47. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-46 of this complaint, as though fully set forth herein.

48. National Van Lines is the owner of the NATIONAL VAN LINES Marks.

49. The NATIONAL VAN LINES Marks are famous and have acquired a strong secondary meaning signifying National Van Lines. These marks were famous and distinctive prior to the registration or use by National Van Equipment of the Infringing Domain.

50. Upon information and belief, National Van Equipment has—itsself or through an affiliate—registered, trafficked in, and used the Infringing Domain.

51. The registration and use of the Infringing Domain violated National Van Lines' rights as the owner of the NATIONAL VAN LINES Marks. National Van Equipment's domain name is confusingly similar to and/or dilutive of the NATIONAL VAN LINES Marks.

52. Upon information and belief, National Van Equipment had, and continues to have, bad faith intent to profit from its registration and use of the Infringing Domain. National Van Equipment willfully and intentionally operates the Infringing Domain with reckless and willful disregard of National Van Lines' rights in the NATIONAL VAN LINES Marks.

53. Upon information and belief, by its acts, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

54. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for Nationwide Van Lines' wrongful acts.

55. This is an exceptional case and National Van Lines is entitled, pursuant to 15 U.S.C. § 1117, to recover its reasonable attorneys' fees.

**FIFTH CLAIM FOR RELIEF**  
**COMMON LAW TRADEMARK INFRINGEMENT**

56. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-55 of this complaint, as though fully set forth herein.

57. National Van Lines owns all right, title, and interest in and to the NATIONAL VAN LINES Marks, including all common law rights in such marks, and such marks are distinctive.

58. The aforementioned acts of National Van Equipment constitute trademark infringement in violation of the common law of the state of New York.

59. Upon information and belief, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

60. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for Nationwide Van Lines' wrongful acts.

**SIXTH CLAIM FOR RELIEF**  
**COMMON LAW UNFAIR COMPETITION**

61. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-60 of this complaint, as though fully set forth herein.

62. The aforementioned acts of National Van Equipment constitute unfair competition in violation of the common law of the State of New York.

63. Upon information and belief, by its acts, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

64. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for Nationwide Van Lines' wrongful acts.

**SEVENTH CLAIM FOR RELIEF**  
**DECEPTIVE ACTS AND PRACTICES (N.Y. G.B.L. § 349)**

65. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-64 of this complaint, as though fully set forth herein.

66. The aforementioned acts of National Van Equipment constitute consumer-oriented conduct that has affected the public interest of New York and has resulted and/or may result in injury to consumers in New York and/or harm to the public.

67. By the acts described herein, National Van Equipment has willfully engaged in deceptive acts or practices in the conduct of its business, in violation of New York General Business Law § 349.

68. Upon information and belief, by its acts, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

69. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for Nationwide Van Lines' wrongful acts.

**EIGHTH CLAIM FOR RELIEF**  
**TRADEMARK DILUTION (N.Y. G.B.L. § 360-L)**

70. National Van Lines realleges and incorporates by reference the allegations contained in paragraphs 1-69 of this complaint, as though fully set forth herein.

71. National Van Lines is the exclusive owner of the NATIONAL VAN LINES Marks throughout the United States, including the State of New York.

72. Through prominent, long, and continuous use in commerce, including commerce within the State of New York, the NATIONAL VAN LINES Marks have become and continue to be famous and distinctive.

73. By the acts described herein, National Van Equipment has diluted the distinctiveness of the NATIONAL VAN LINES Marks and has caused a likelihood of harm to National Van Lines' business reputation, in violation of New York General Business Law § 360-1.

74. Upon information and belief, by its acts, National Van Equipment has made and will make substantial profits and gains to which it is not in law or equity entitled.

75. National Van Lines is being damaged by this conduct and is without an adequate remedy at law to compensate it for Nationwide Van Lines' wrongful acts.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff National Van Lines, Inc. asks this Court to enter judgment in its favor against Defendant National Van Equipment Company, Inc. as follows:

A. For a permanent injunction restraining National Van Equipment from the unlawful, unfair, fraudulent, deceptive and misleading acts and conduct set forth above, and

enjoining National Van Equipment from using any mark, slogan, Internet domain name or other device that infringes (*i.e.*, is confusingly similar to) the NATIONAL VAN LINES Marks for any purpose—including, but not limited to, for use in connection with any website or sale of any product or service;

B. For an order directing National Van Equipment to file with this Court and serve on National Van Lines within three days after service of an injunction a written report under oath setting forth in detail the manner and form in which National Van Equipment has complied with the injunction pursuant to 15 U.S.C. § 1116;

C. For an order requiring National Van Equipment and all those in privity with it to surrender for destruction all materials incorporating or reproducing the Infringing Mark pursuant to 15 U.S.C. § 1118 and the equitable power of this Court to enforce the common law of New York;

D. For an order requiring National Van Equipment, in accordance with 15 U.S.C. § 1125(d), to forfeit and transfer all rights in the domain name <nationalvanequip.com> to National Van Lines and deliver to National Van Lines all documents evidencing ownership of that domain name;

E. For an accounting of the gains and profits realized by National Van Equipment from its wrongful acts of false designation of origin, infringement, dilution, cybersquatting, and unfair and deceptive trade practices, and recovery of all actual damages suffered and sustained by National Van Lines as a result of National Van Equipment's aforementioned wrongful acts, as well as payment for the costs of this action and prejudgment interest, pursuant to 15 U.S.C. § 1117;

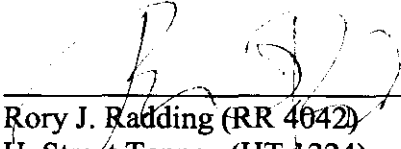
- F. For increased and punitive damages as allowed by the law—including, but not limited to, those increased damages authorized by 15 U.S.C. § 1117;
- G. For National Van Lines' attorneys' fees pursuant to 15 U.S.C. § 1117; and
- H. For such other and further relief as may be just and equitable.

**JURY DEMAND**

Plaintiff National Van Lines, Inc. hereby demands and requests a trial by jury on all issues so triable.

Dated: New York, New York  
May 21, 2014

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Fax (312) 201-2555

*Attorneys for Plaintiff National Van Lines, Inc.*

# **EXHIBIT A**

Int. Cl.: 39

Prior U.S. Cl.: 105

United States Patent and Trademark Office

Reg. No. 563,950

Registered Sep. 9, 1952

10 Year Renewal

Renewal Term Begins Sep. 9, 1992

**SERVICE MARK  
PRINCIPAL REGISTER**

**NATIONAL VAN LINES**

NATIONAL VAN LINES, INC. (ILLI-  
NOIS CORPORATION)  
2800 ROOSEVELT ROAD  
BROADVIEW, IL 60153

OWNER OF U.S. REG. NO. 548,018.  
APPLICANT DISCLAIMS EXCLUSIVE  
USE OF THE WORDS "VAN LINES,  
INC." APART FROM THE MARK AS  
SHOWN.

SEC. 2(F).

FOR: TRANSPORTATION OF GOODS  
BY MOTOR VAN, IN CLASS 105 (INT.  
CL. 39).

FIRST USE 10-0-1928; IN COMMERCE  
6-21-1934.

SER. NO. 71-623,200, FILED 1-4-1952.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Nov. 17, 1992.*

COMMISSIONER OF PATENTS AND TRADEMARKS





Registered Sept. 9, 1952

Registration No. 563,950

**PRINCIPAL REGISTER**  
**Service Mark**

**UNITED STATES PATENT OFFICE**

National Van Lines, Inc., Chicago, Ill.

Act of 1946

Application January 4, 1952, Serial No. 623,200

**NATIONAL VAN LINES**

**STATEMENT**

National Van Lines, Inc., a corporation duly organized under the laws of the State of Illinois, located at Chicago and doing business at 2431 Irving Park Road, has adopted and is using the service mark shown in the accompanying drawing, for the TRANSPORTATION OF GOODS BY MOTOR VAN, in Class 105, Transportation and storage, and presents herewith five specimens showing the service mark as actually used in connection with the sale of advertising of such services; the service mark being used as follows: on the sides of the trucks used in moving goods; on advertising literature; on business cards; and on letter heads and envelopes, and requests that the same be registered in the United States Patent Office on the Principal Register in accordance with section 2(f) of the act of July 5, 1946.

Applicant disclaims exclusive use of the words "Van Lines, Inc." apart from the mark as shown.

National Van Lines, Inc., is the owner of Registered Service Mark 544,018, registered September 11, 1951, on the Principal Register of the United States Patent Office.

The service mark was first used by applicant's predecessor in title on or about October 1928, and first used by applicant on June 21, 1934, and first used in the sale or advertising of services and the services rendered in commerce among the several States which may lawfully be regulated by Congress by applicant's predecessor in title on or about October 1928, and by applicant on June 21, 1934.

The mark is claimed to have become distinctive of the applicant's services in commerce which may lawfully be regulated by Congress through substantially exclusive and continuous use thereof as a mark by the applicant in commerce among the several States which may lawfully be regulated by Congress for the five years next preceding the date of the filing of this application.

NATIONAL VAN LINES, INC.,  
By FRANK L. McKEE,  
President.

AFFIDAVIT SEC. 15  
JUL 27 1961

AFFIDAVIT SEC. 8

# United States Patent Office

712,297  
Registered Mar. 7, 1961

## PRINCIPAL REGISTER Service Mark

Ser. No. 88,872, filed Dec. 28, 1959



National Van Lines, Inc. (Illinois corporation)  
2800 Roosevelt Road  
Broadview, Ill.

For: TRANSPORTATION OF HOUSEHOLD  
GOODS AND UNCRATED NEW FURNITURE,  
STORING, AND ARRANGING FOR THE SHIPMENT  
OF GOODS INCIDENTAL TO SAID TRANSPORTA-  
TION, in CLASS 105.

First use on or about Mar. 5, 1959; in commerce on or  
about Mar. 5, 1959,

Owner of Reg. Nos. 548,018, 669,097, and others.

COMB. AFF. SEC 8 & 15

2 MAY 1968

Int. Cl.: 39

Prior U.S. Cl.: 105

**United States Patent and Trademark Office**

Reg. No. 1,716,566

Registered Sep. 15, 1992

**SERVICE MARK  
PRINCIPAL REGISTER**



NATIONAL VAN LINES, INC. (ILLINOIS CORPORATION)  
2800 ROOSEVELT ROAD  
BROADVIEW, IL 60153

FOR: MOVING VAN SERVICES, IN CLASS 39  
(U.S. CL. 105).

FIRST USE 7-21-1934; IN COMMERCE  
7-21-1934.

OWNER OF U.S. REG. NOS. 563,950 AND  
712,297.

NO CLAIM IS MADE TO THE EXCLUSIVE  
RIGHT TO USE "VAN LINES, INC" , APART  
FROM THE MARK AS SHOWN.

SEC. 2(F).

SER. NO. 74-(48,941), FILED 3-18-1991.

ANGELA M. MICHELI, EXAMINING ATTOR-  
NEY

Int. Cl.: 39

Prior U.S. Cl.: 105

**United States Patent and Trademark Office** **Reg. No. 1,718,818**  
**Registered Sep. 22, 1992**

**SERVICE MARK  
PRINCIPAL REGISTER**

**NATIONAL**

NATIONAL VAN LINES, INC. (ILLINOIS COR-  
PORATION)  
2800 ROOSEVELT ROAD  
BROADVIEW, IL 60153

FOR: MOVING VAN SERVICES, IN CLASS 39  
(U.S. CL. 105).

FIRST USE 10-0-1928; IN COMMERCE  
10-0-1928.  
SEC. 2(F).

SER. NO. 74-148,917, FILED 3-18-1991.

ANGELA M. MICHELL, EXAMINING ATTOR-  
NEY

## **Exhibit B**

United States - English Currency: USD

24/7 Support: (480) 505-8877

[Sign In](#) [Register](#)[All Products](#) [Domains](#) [Websites](#) [Hosting & SSL](#)

NEW

[Get Found](#) [Email & Tools](#) [Support](#)

WHOIS search results for:

**NATIONALVANEQUIP.COM**

(Registered)

Is this your  
domain?

Add hosting, email and more.

[GO](#)Want to buy  
this domain?

Get it with our Domain Buy service.

[GO](#)

## Domain already taken?

Enter Domain Name

.com

[Search](#)

### NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand and enable you to capture more Web traffic, which you can then direct to your primary domain.

#### Domains available for new registration:

##### Alternate TLDs

nationalvanequip.info	SAVE!	\$2.99*/yr
nationalvanequip.net	SAVE!	\$9.99*/yr
nationalvanequip.org	SAVE!	\$12.99*/yr
nationalvanequip.us	SAVE!	\$3.99/yr
nationalvanequip.biz	SAVE!	\$7.99*/yr
nationalvanequip.mobi	SAVE!	\$9.99*/yr
nationalvanequip.ca		\$12.99/yr
nationalvanequip.me	SAVE!	\$9.99/yr

##### Similar Premium Domains ?

SafariVans.com	\$1,499.00*
MedicalVans.com	\$799.00*
ModifiedVans.com	\$1,149.00*
NationalHomedAtA.com	\$488.00*
NationalHomeEducation.com	\$488.00*
NationalHomeLink.com	\$488.00*

[ADD TO CART](#)

#### Domains available at Go Daddy Auctions®:

<a href="#">petroequip.com</a>	Ends on: 8/12/2014 2:50:00 PM PDT	\$3,388.00*
<a href="#">mobilequip.com</a>	Ends on: 7/29/2014 10:31:00 AM PDT	\$1,388.00*
<a href="#">evane.net</a>	Ends on: 7/29/2014 12:07:00 AM PDT	\$195.00*
<a href="#">medquip.net</a>	Ends on: 7/28/2014 12:01:00 AM PDT	\$350.00*
<a href="#">camequip.net</a>	Ends on: 7/27/2014 8:42:00 PM PDT	\$995.00*
<a href="#">modernequip.com</a>	Ends on: 7/27/2014 11:32:00 AM PDT	\$695.00*

[VIEW LISTING](#)

### Learn more about

<a href="#">Private Registration</a>	?	<a href="#">Deluxe Registration</a>	?
<a href="#">Business Registration</a>	?	<a href="#">Protected Registration</a>	?

Domain Name: NATIONALVANEQUIP.COM  
 Registry Domain ID:  
 Registrar WHOIS Server: whois.networksolutions.com  
 Registrar URL: http://www.networksolutions.com/en\_US/  
 Updated Date: 2014-01-28T00:00:00Z  
 Creation Date: 2000-03-10T00:00:00Z  
 Registrar Registration Expiration Date: 2015-03-10T00:00:00Z  
 Registrar: NETWORK SOLUTIONS, LLC.  
 Registrar IANA ID: 2  
 Registrar Abuse Contact Email: abuse@web.com  
 Registrar Abuse Contact Phone: 800-333-7680  
 Reseller:  
 Domain Status: clientTransferProhibited  
 Registry Registrant ID:  
 Registrant Name: Binary Connections, Inc.  
 Registrant Organization: Binary Connections, Inc.  
 Registrant Street: 28 Bridle Path  
 Registrant City: Roslyn  
 Registrant State/Province: NY  
 Registrant Postal Code: 11576  
 Registrant Country: US  
 Registrant Phone: 516-315-9942  
 Registrant Phone Ext:  
 Registrant Fax: 516-908-4030  
 Registrant Fax Ext:  
 Registrant Email: mike@nationalvanequip.com  
 Registry Admin ID:  
 Admin Name: Safier, Michael  
 Admin Organization: Binary Connections, Inc.  
 Admin Street: 28 Bridle Path  
 Admin City: Roslyn  
 Admin State/Province: NY  
 Admin Postal Code: 11576-3121  
 Admin Country: US  
 Admin Phone: 516-315-9942  
 Admin Phone Ext:  
 Admin Fax: 516-908-4030  
 Admin Fax Ext:  
 Admin Email: mbsafier@firetracker.net  
 Registry Tech ID:  
 Tech Name: Safier, Michael  
 Tech Organization: Binary Connections, Inc.  
 Tech Street: 28 Bridle Path  
 Tech City: Roslyn  
 Tech State/Province: NY  
 Tech Postal Code: 11576-3121  
 Tech Country: US  
 Tech Phone: 516-315-9942  
 Tech Phone Ext:  
 Tech Fax: 516-908-4030  
 Tech Fax Ext:  
 Tech Email: mbsafier@firetracker.net  
 Name Server: NS1.DNSPARK.NET  
 Name Server: NS5.DNSPARK.NET  
 Name Server: NS3.DNSPARK.NET  
 Name Server: NS4.DNSPARK.NET  
 Name Server: NS2.DNSPARK.NET  
 DNSSEC: not signed  
 URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/  
 >>> Last update of whois database: Thu, 15 May 2014 16:26:11 UTC <<<

The data in Networksolutions.com's WHOIS database is provided to you by Networksolutions.com for information purposes only, that is, to assist you in obtaining information about or related to a domain name registration record. Networksolutions.com makes this information available "as is," and does not guarantee its accuracy. By submitting a WHOIS query, you agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (1) allow, enable,

or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via direct mail, electronic mail, or by telephone; or (2) enable high volume, automated, electronic processes that apply to Networksolutions.com (or its systems). The compilation, repackaging, dissemination or other use of this data is expressly prohibited without the prior written consent of Networksolutions.com. Networksolutions.com reserves the right to modify these terms at any time. By submitting this query, you agree to abide by these terms.

\*Plus ICANN fee of \$0.18 per domain name year.

\*\* CA domain names will be registered through Go Daddy Domains Canada, Inc., a CIRA certified registrar.

Registrar: NETWORK SOLUTIONS, LLC.  
Whois Server: whois.networksolutions.com  
Creation Date: 10-MAR-2000  
Updated Date: 28-JAN-2014  
Expiration Date: 10-MAR-2015

Nameserver: NS1.DNSPARK.NET  
Nameserver: NS2.DNSPARK.NET  
Nameserver: NS3.DNSPARK.NET  
Nameserver: NS4.DNSPARK.NET  
Nameserver: NS5.DNSPARK.NET

Registry Status: clientTransferProhibited

[See Underlying Registry Data](#)

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.com

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# **Exhibit C**





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NATIONAL VAN EQUIPMENT has manufactured moving pads and custom covers in the U.S.A. since 1991. Our manufacturing facility utilizes the most modern equipment and we are constantly searching for the highest quality fabrics that will provide our customers with the best products at reasonable prices.

We maintain a large inventory to meet most requirements in 24 hours and special requests are given prompt attention.

Customize your furniture pads to meet your requirements. Make them larger, smaller, heavier, lighter, choose your fabric or have the binding imprinted. For the ultimate in customization take advantage of our **FULL PAD IMPRINTING** - 3 lines of printing of your choice. Suggestions for printing include your company name, toll-free phone number, website address, company slogan, etc.

We also welcome requests for custom size quilted covers.

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